

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff / Counterclaim Defendant,

v.

ALAN DERSHOWITZ,

Defendant / Counterclaim Plaintiff

Case No. 19-cv-03377-LAP

**SUPPLEMENTAL DECLARATION OF CHRISTIAN G. KIELY**

I, Christian G. Kiely, hereby declare as follows:

1. I am counsel to Defendant and Counterclaim Plaintiff Alan Dershowitz in this action. I make this supplemental declaration in further support of Professor Dershowitz's Motion to Disqualify Cooper & Kirk PLLC.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's First Set of Requests for Production to Defendant Alan Dershowitz.

3. Attached hereto as Exhibit B and is a true and correct copy of Professor Dershowitz's narrowed request for the production of certain specific categories of confidential case materials from *Giuffre v. Maxwell*, previously filed as Appendix A to ECF No. 153.

4. Attached hereto as Exhibit C is a chart which compares the categories of documents included in Professor Dershowitz's narrowed request for the production of certain specific categories of confidential *Maxwell* case materials (Ex. B hereto) with Plaintiff's own document requests (Ex. A hereto) and search terms which Plaintiff requested be run against Professor Dershowitz's Gmail account.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Christian G. Kiely  
Christian G. Kiely

Dated: December 11, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent via the Court's electronic filing system, and served to all counsel of record on December 11, 2020.

/s/ Christian G. Kiely  
Christian G. Kiely